## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO. 18-07127 ESL

DIANA IVELISSE LAGARES SANTANA

CHAPTER 13

DEBTORS

## MOTION REQUESTING CONTINUANCE OF CONFIRMATION HEARING SCHEDULED FOR MAY 22, 2019 AT 9:00AM DOCKET NO. 20

## TO THE HONORABLE COURT:

COMES NOW, the Debtor DIANA IVELISSE LAGARES SANTANA, through the undersigned attorney, and very respectfully states, alleges and prays as follows:

- 1. In the present Chapter 13 case, the Court scheduled a confirmation hearing for May 22, 2019 at 9:00AM, Docket No. 20. Confirmation of the Debtor's proposed Chapter 13 Plan hinges on the outcome of a contested matter concerning the residential mortgage creditor, EMI Equity Mortgage, Inc., in the above captioned case. See: Docket Nos. 22, 25, 26 and 27.
- 2. The Debtor respectfully requests from this Honorable Court to continue the Chapter 13 confirmation hearing for a future date since the present case is not ready for confirmation.
- 3. Furthermore, the undersigned attorney respectfully states that he will be attending the 2019 NACBA's 27<sup>th</sup> Annual Convention in Cleveland, Ohio, May 16-19, 2019 and that he [the Debtor's attorney] will return to his office on May 25, 2019.
- 4. That in view of the aforesated, the Debtor's attorney will be out of Puerto Rico and will not be able to appear at the scheduled confirmation hearing for May 22, 2019.

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5. Therefore, the Debtor respectfully requests from this Honorable Court that for the above stated reasons, the Chapter 13 confirmation hearing scheduled for May 22, 2019 be continued for a future date, in the above captioned case.

6. The Debtor respectfully submits that in further support of this motion for continuance, it is stated that said continuance of the confirmation hearing is not requested for the purpose of delay and will not cause any prejudice to all parties to the present case.

WHEREFORE, the Debtor respectfully requests that for the above stated reasons this Honorable Court grant the requested continuance of the confirmation hearing scheduled for May 22, 2019, at 9:00AM (Docket No. 20), in the present case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notice of same to all CM/ECF participants including: Alejandro Oliveras Rivera, Esq. Chapter 13 Trustee; and via regular U.S. mail to the Debtor Diana Ivelisse Lagares Santana, PO Box 5354 Caguas PR 00726.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 9th day of May, 2019.

/s/Roberto Figueroa Carrasquillo
USDC #203614
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